

Kenneth A. Hill  
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ATTORNEYS FOR THE TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

IN RE:	§	
	§	
DENNIS JAMES ROGERS II,	§	CASE NO. 22-30500-swe7
	§	(Involuntary Proceeding)
DEBTOR.	§	

**NOTICE OF FILING FIRST INTERIM APPLICATION FOR  
ALLOWANCE OF FEES AND EXPENSES OF SPECIAL COUNSEL**

**NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE ST., DALLAS, TX 75242 BEFORE THE CLOSE OF BUSINESS ON AUGUST 14, 2024 WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

On July 24, 2024, Areya Holder Aurzada (the “Trustee”), in her capacity as the chapter 7 trustee for Dennis James Rogers II (the “Debtor”), files this *First Interim Application for Allowance of Fees and Expenses of Special Counsel* (the “Application”). The Application

requests interim approval of compensation for Schneider Miller Reynolds, P.C. (“SMR”) and Dortch Lindstrom Livingston Law Group (“DLLLLG”), as special counsel for the Trustee in the following amounts for the period of time from May 26, 2022 through July 15, 2024:

	Fees	Expenses
SMR	\$25,995.00	\$20,000.00
DLLLLG	\$24,000.00	\$0.00

Any party in interest may obtain a copy of the Application free of charge by making a written request to Diana Cruz at Quilling, Selander, Lownds, Winslett & Moser, P.C., 2001 Bryan Street, Suite 1800, Dallas, Texas 75201, fax (214) 871-2111, e-mail [dcruz@qslwm.com](mailto:dcruz@qslwm.com).

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
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By: /s/ Kenneth A. Hill  
Kenneth A. Hill  
State Bar No. 09646950  
ATTORNEYS FOR THE TRUSTEE

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served concurrently with filing (a) by ECF upon all persons who have filed ECF appearances in this case and (b) by first class mail, postage prepaid, on the persons and entities set forth on the attached service list. The service list is omitted from service copies to avoid unnecessary copying and postage charges, but a copy can be obtained free of charge by making a written request to Diana Cruz at Quilling, Selander, Lownds, Winslett & Moser, P.C., 2001 Bryan Street, Suite 1800, Dallas, Texas 75201, fax (214) 871-2111, e-mail [dcruz@qslwm.com](mailto:dcruz@qslwm.com).

/s/ Kenneth A. Hill  
Kenneth A. Hill

Label Matrix for local noticing  
0539-3  
Case 22-30500-swe7  
Northern District of Texas  
Dallas  
Wed Jul 24 10:01:21 CDT 2024

Dallas County  
Linebarger Goggan Blair & Sampson, LLP  
c/o Sherrel K. Knighton  
2777 N Stemmons Frwy, Suite 1000  
Dallas, TX 75207-2328

Frost Bank  
c/o Karl Dial  
Greenberg Traurig, LLP  
2200 Ross Avenue, Suite 5200  
Dallas, TX 75201-2794

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

JPMorgan Chase Bank, N.A.  
c/o Suyash Agrawal  
Massey & Gail LLP  
50 E. Washington Street, Suite 400  
Chicago, IL 60602-2100

Mandarin Capital, LLC  
2600 Cecil Drive  
Holladay, UT 84124-2906

(p)WILDCAT LENDING FUND ONE LP  
4800 DEXTER DRIVE  
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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PO BOX 7999  
ST CLOUD, MN 56302-9617

Wildcat Lending Fund One, LP  
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Plano, TX 75093

(d)Jefferson Capital Systems, LLC  
PO Box 7999  
St. Cloud, MN 56302-9617

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ACMC Finance and Trade LLC

(u)BAMCG Bridge Partners LP

(u)Dortch Lindstrom Livingston Law Group

(u)FUNDERZ.NET, LLC

(u)Goldman Sachs & Company LLC

(u)John S. Foreman, III

(u)Lincoln Automotive Financial Services

(u)Quilling, Selander, Lownds, Winslett & Mos

(u)Schneider Miller Reynolds, P.C.

(d)John and Ronda Harris  
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(u)Allison Rogers

(u)Andre C. Leblanc

End of Label Matrix  
Mailable recipients 87  
Bypassed recipients 13  
Total 100